

June 23, 2015

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Subject: Proposed changes to the MWELo.

Dear Ms. Saare-Edwards:

As an irrigation consultant practicing in California for over 30 years, I have seen many changes in the landscape industry over that time. The primary change has been the acceptance of lower water use landscapes and higher efficiency irrigation systems. Some, but certainly not all, of these changes have come through the implementation of new regulations for water conservation. Landscape architects and irrigation designers are universally concerned about our environment and how we use our precious water resources. Much of the development of low water use plantings has come by way of the demand for lower water use plant materials by landscape architects. Irrigation designers embraced and championed the high efficiency drip systems long before AB 1881 made so many of these products mandatory. I can look back to 1988 to recall my first subsurface drip tubing system. And I know that I am not alone in being an early adopter of this sort of technology.

Unfortunately, we landscape professionals are being identified as the cause of the water problems that we are experiencing and not a solution. This was clearly expressed back in 2009 at a meeting in Los Angeles for public agencies where a DWR spokesperson, told the audience that the reason the requirements included a signature indicating compliance was the “we want make sure these people are held responsible for their designs”. Well, after 30 years in this field, and over 25 in business for myself, I can tell you that I have always been responsible for my designs. But, what I am not responsible for is the way that they are modified, without my knowledge, in the field or managed after installation. That is where the vast majority of water waste issues arise, and without any real control or enforcement.

While the common assumption is that by using drip irrigation and smart controls all our problems will be solved is simply naive. I have seen many well designed irrigation systems managed to a point of extreme water waste by landscape maintenance personnel. That, in my opinion, is where the state should be looking to conserve water, not through the implementation of unobtainable efficiencies and poorly thought out rules for the design professionals.

You will be receiving a well-researched and detailed list of objections to the new MWELo from the American Society of Irrigation Consultants (ASIC), of which I am a member. I fully support the concerns, conclusions and recommendations stated in that letter. Furthermore I suggest that the state cut the bureaucratic complexity and simply develop a simple allocation based system that defines the acceptable water use for every landscape project in the state. An allocation calculation, much like the current MAWA, could be customized by region (for climate differences) and be applied to both new and existing projects.

The implementation of an allocation system alone would force existing, water wasteful landscape owners into making changes to their management or renovating their landscapes to reduce their water consumption. New projects would follow the same allocation requirements. By not requiring complex and restrictive water

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application rules, the industry will respond with new products and design techniques that will meet or exceed the water reduction goals. Please do not tie our hands with application rate restrictions that eliminate some of the most efficient products we have at our disposal. Simply state the maximum amount of water that a project can use and let us design it to comply.

I appreciate your efforts and the opportunity to provide comments. I am hoping that the concerns of the irrigation professionals are fully considered in the development of the new MWELO.

Thank you,

A handwritten signature in black ink, reading "Lance Sweeney". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Lance Sweeney  
President  
Sweeney & Associates, Inc.